

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

CONTENTGUARD HOLDINGS, INC.,

Plaintiff,

v.

AMAZON.COM, INC.; APPLE INC.;  
BLACKBERRY LIMITED (FKA RESEARCH  
IN MOTION LIMITED) AND BLACKBERRY  
CORPORATION (FKA RESEARCH IN  
MOTION CORPORATION); HTC  
CORPORATION AND HTC AMERICA, INC.;  
HUAWEI TECHNOLOGIES CO., LTD. AND  
HUAWEI DEVICE USA, INC.; MOTOROLA  
MOBILITY LLC; SAMSUNG ELECTRONICS  
CO., LTD., SAMSUNG ELECTRONICS  
AMERICA, INC., and SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC,

Defendants.

**No. 2:13-cv-01112 (JRG)**

**JURY TRIAL DEMANDED**

**NOTICE OF COMPLIANCE WITH THIRD-PARTY PRODUCTION  
PROVISIONS BY DEFENDANT APPLE, INC.**

Pursuant to Paragraph 12 of the Amended Protective Order Regarding the Disclosure and Use of Discovery Materials (Dkt. No. 152), notice is given that Defendant Apple Inc. ("Apple") produced third-party confidential information in compliance with the Amended Protective Order and verifies as follows:

- 1. Universal Studios Home Entertainment LLC:** Apple notified Universal Studios Home Entertainment LLC ("Universal") of its intent to produce Universal confidential information via Federal Express overnight delivery by letter dated December 1, 2014 with the Amended Protective Order attached and a copy of the confidential information

Apple intended to disclose. The Federal Express envelope was delivered to Universal on December 2, 2014. Apple has not received an objection.

2. **MGM Domestic Digital Media, Inc.:** Apple notified MGM Domestic Digital Media, Inc. (“MGM”) of its intent to produce MGM confidential information via Federal Express overnight delivery by letter dated December 1, 2014 with the Amended Protective Order attached and a copy of the confidential information Apple intended to disclose. The Federal Express envelope was delivered to MGM on December 2, 2014. Apple has not received an objection.
3. **The NPD Group, Inc.:** Apple notified The NPD Group, Inc. (“NPD”) of its intent to produce NPD confidential information via email by letter dated December 2, 2014, with the Amended Protective Order attached and a copy of the confidential information Apple intended to disclose. Apple has not received an objection.

Dated: December 18, 2014

/s/ Melissa R. Smith

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*Attorneys for Defendant Apple Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on December 18, 2014. *See* Local Rule CV-5(a)(3)(A).

*/s/ Melissa R. Smith*  
Melissa R. Smith